

Exhibit R

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC.; *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; *et al.*,

Defendants.

Civil Action No.

DECLARATION OF JANE DOE 4

I, Jane Doe 4, hereby declare and state and follows:

1. I am over 18 years of age, of sound mind, and in all respects competent to testify.
2. I have personal knowledge of the facts set forth in this declaration and would testify competently to those facts if called to do so.
3. I live in the State of Wisconsin with my four children and my spouse.
4. One of my children, my daughter Jessica Doe, is 13 years old. My spouse and I adopted Jessica when she was two years old, but we served as her foster parents since her birth.
5. My family is a member of PFLAG.
6. My daughter is a kind, creative, and brave young woman. She is an incredibly talented artist, and she loves anime. She is also a brilliant chef, who has been cooking for our family since she was six years old.
7. When my daughter was born, her sex was assigned as male. But that is not who she is. By the time she was three years old, she made it very clear to us that she was a girl, not a boy. We sought to learn more and support her as best we could. She asked us to call her Jessica and to

use she/her or they/them pronouns by age five. We obtained a legal name change for her in the fall of 2024, and she is open with her peers about being transgender.

8. When Jessica was five years old, we found a therapist with experience working with transgender youth to help her explore her gender identity and to provide her with a resource for any questions she might have, such as how to navigate school. Jessica has been seeing this therapist for more than eight years now. Her therapist diagnosed Jessica with gender dysphoria.

9. We set up an appointment with the Gender Health Program at the Children's Hospital of Wisconsin ("Children's Wisconsin") in 2020, when Jessica was approximately 9 years old. Her doctors there explained to us the various options for medical care, if that was something we wanted to pursue, and we had conversations about risks, benefits, and side effects. With time, Jessica's distress over the prospect of undergoing a masculine puberty grew. I remember her crying and telling me that she did not want a beard and did not want her voice to drop. After talking through the side effects and various options transparently and thoroughly with the doctors at Children's Wisconsin, I knew that puberty blockers would be the best medical decision for Jessica, as I did not want her to suffer immensely due to male puberty. We decided, in consultation with the doctors at Children's Wisconsin and Jessica's long-time therapist, that she would start receiving puberty blockers. She began puberty blockers near the end of 2021.

10. Jessica was extremely scared of undergoing a male puberty. It is clear that puberty blockers have tremendously improved Jessica's mental health. She told me that the blockers have given her an immense sense of relief. Prior to receiving puberty blockers, Jessica's mental health struggled as a consequence of gender dysphoria, and she was having thoughts of self-harm, and she had to be hospitalized in an outpatient intensive program as a result. She has come a long way since that time, and I believe puberty blockers have been a large reason why. We also discussed at

great length whether and when Jessica would start estrogen under the care of the doctors at Children's Hospital. We decided again in consultation with the doctors at Children's Hospital, Jessica's therapist, and Jessica, that she should move forward with estrogen to treat her gender dysphoria.

11. In order to receive a prescription for estrogen, Jessica had to obtain letters of support from her therapist and other doctors, as well as go through bloodwork. It was a lengthy process, but this past December, Jessica finally received approval to move forward with estrogen as her hormone replacement therapy. We made an appointment at Children's Wisconsin for February 3, 2025 for her to receive her first dose of estrogen.

12. On Tuesday, January 28, 2025, the White House issued an Executive Order entitled "Protecting Children from Chemical and Surgical Mutilation" (the "Executive Order").

13. On Thursday, January 30, 2025, I received a call from Children's Wisconsin saying that they were not able to start new gender-affirming medical treatments because of the Executive Order. They told me that they were not able to provide estrogen to her at this time.

14. On Friday, February 7, 2025, I received another call from Children's Wisconsin informing me that they were not accepting new patients due to the Executive Order, but because Jessica had already established care, they would be able to see us. Although we were able to obtain a prescription for estrogen for Jessica, her doctors stressed that they could not ensure care would continue, and that Jessica's care could be stopped at any time. Jessica and I are both afraid that her healthcare access will be cut off again for reasons outside our control.

15. Jessica is Black, and she is very aware of the high rates of violence against Black trans women. Jessica often puts on a brave face, but I know that she is disappointed, scared, and

angry about the disruption in her access to this care. She is terrified of what might happen if she does not consistently get the care she needs.

16. Jessica received her third puberty-blocking implant in November 2024, which will need to be replaced. If Jessica cannot continue to receive gender-affirming care, it would be devastating. Undergoing her endogenous puberty would be irreversible and destructive for her, and it would cause her significant dysphoria. I am terrified that, without being able to continue to have access to the treatment she needs, her mental health will suffer and regress to the state it was before she received blockers and she will begin to self-harm.

17. As her mother, Jessica's health and safety is my greatest priority. The medical care that she has received so far has allowed her to participate fully in life and to be who she knows she is. I would walk to the ends of the earth to get my daughter the care she needs, and it causes me so much pain to know that her medical care is under threat.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this 9th day of February 2025.


Jane Doe 4